



Transmission Business Line (TBL)

Customer Comments and TBL Responses to BUS 002.1

TBL Business Practices and Procedures

Posted December XX, 2003

This document contains the customer comments for, and the responses to those comments from Bonneville Power Administration Transmission Business Line (TBL) for the TBL Business Practices and Procedures, Version 1 business practice.

Thank-you for your comments.

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Bonneville Power Administration Power Business Line (PBL)

PBL submitted the following comments to the businesspractice@bpa.gov email box on Friday 11/7/2003 10:13 a.m.

Comments

We concur with TBL's Business Practices & Procedures. However, in the most recent past, TBL has not used the approach outlined in their official procedures. Namely: Section B. 2. (states) "After a draft business practice has been approved by TBL, it is posted on the TBL Web Site for customer review and comment and an email message is sent to the subscribers of the information Notification list." Also stated in your policy is: "Normally new draft business practices are posted for a comment period of 15 calendar days. . ."

The most recent example of where this policy was not adhered to was in the revision to the Short-Term Market window (e.g., closing at 7 a.m. rather than 9 a.m. . . . plus, the change from 10 a.m. to 9 a.m. in 2002). This is an example of a change that has a large financial impact on PBL and possibly other marketers. Not only was this change not posted for comment, customers were not given any leadtime (notification) to implement the change within their own companies.

PBL applauds TBL's efforts to inform and disseminate information to customers ---- we request that TBL adhere to this notification policy plus, make every effort to incorporate customers concerns and comments into these Practices & so that they not only help TBL "efficiently conduct business", but, that they do not put an undue/unreasonable burden on the customers to do business with TBL.

Thank you for giving us the opportunity to comment.

Bonita R. Smulski
PBL Transmission Trader

TBL Response to PBL Comments

Thank-you for your comments on this business practice. It is unfortunate that the defined 15-day comment period was not observed in determining a time change of the short-term window. That change was driven by the necessity of using a manual procedure for short-term reservations, and occurred several months prior to the posting and effective date of this business practice.

In response to other customer comments, TBL is lengthening the normal customer comment period to 15 business days, and will make every effort to adhere to that comment period in the future. However, TBL does reserve the right to shorten the customer comment period due to an urgent business need.

Powerex

Powerex submitted the following comments to the businesspractice@bpa.gov email box on Friday, 11/21/2003 6:19 p.m.

Comments

To Who It May Concern:

Thank you for providing an opportunity to comment on the Transmission Business Line's (TBL) recently developed business practice intended to be used as a guideline for the development and distribution of Business Practices. We have reviewed the posting of 6 November 2003 and believe that it is a positive step in an effort to secure input from customers when developing, modifying and implementing business practices. We welcome the opportunity to comment on any changes or additions to business practices that TBL considers necessary, as it allows TBL's customers to benefit from learning about issues and opportunities that TBL has identified and for TBL to benefit by gaining insights into its customers' perspectives. Indeed, we hope that TBL would see benefit in including Powerex and its other customers, not only in the official business practice posting process as outlined but also on an informal basis through ongoing dialogue. In fact, one of our specific suggestions regarding this posting is to reference TBL's commitment to informally consult with customers that would be most greatly impacted by any modification to existing practices or newly developed practices in advance of formally seeking comment. To this end, we consider the business practice forums and conference calls that TBL has currently put in place as being very useful vehicles and we welcome TBL to go even further by contacting operational staff directly in order to discuss any issues that could benefit TBL's deliberations and decision processes.

In addition, we have a general concern that some of TBL's business practices are not consistently applied and we are interested in getting access to the appropriate individuals within TBL in order to make our concerns known and be assured that those concerns will be understood, considered and to the extent possible, resolved in a mutually agreeable manner. Here, in particular, on-going dialogue between Powerex (and other TBL customers) and TBL (perhaps by establishing a team of individuals within TBL who are given the responsibility to address perceived inconsistencies, and some of whom would always be available for consultation) could be very beneficial in terms of gaining improved efficiencies over current practices. A specific and current area of confusion is the queuing protocol for a short-term firm request for transmission capacity.

Lastly, in all situations where there is not a serious and immanent reliability issue that would require immediate action, Powerex would like to see a firm TBL commitment to consulting with its customers on business practices so that we can all avoid as many problems as possible with new business practices.

TBL Business Practices and Procedures, Ver. 1 Customer Comments

Our thanks again, for seeking our input on this "business practice business practice". If any questions arise, please contact Mike Goodenough at 604.891.6008.

Sincerely yours,

Gordon Dobson-Mack

TBL Response to Powerex Comments

TBL will continue to solicit customer input through the Business Practice Technical Forums, conference calls, and other customer meetings and contacts, as well as through the formal customer review and comment period for each business practice. In some cases, we may follow-up on formal comments with phone call to assure that we understand what was said.

We encourage all customers to take advantage of these opportunities to provide input to TBL business practices and procedures, and will continue to evaluate that input as we make decisions.

Customers are welcome to contact TBL if there is concern about the consistent application of a business practice. As always, the primary point of contact for these issues is your account executive (AE).